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VIA ECFS

September 3, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Application of Qwest Corporation d/b/a CenturyLink QC Pursuant to 47 C.F.R.
§ 63.63 for the Emergency Impairment of Service; WC Docket No. 19-69

Dear Ms. Dortch:

On September 18, 2018, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) filed the above-referenced application for the emergency impairment of service in limited portions of the Florence, Colorado wire center primarily as a result of damage sustained from flooding in mid-July 2018 (“Application”).¹ The prolonged service impairment in this area is still ongoing. CenturyLink has made filings to extend authority for this emergency impairment, and, by this letter, seeks a further extension of authority for an additional 60 days. CenturyLink continues to explore a variety of options for service restoral while maintaining community engagement in this matter. However, the substantial challenges in this area as described in the Application and subsequently-filed extensions, which are incorporated herein by reference, remain and wireline telecommunications services have not been restored to the area. Accordingly, pursuant to Section 63.63(b) of the Commission’s Rules, 47 C.F.R. § 63.63(b), CenturyLink respectfully requests an additional 60-day extension of the authority for the emergency impairment of service in limited portions of the Florence wire center.

As stated in the Application, CenturyLink is still unable to state what effect this impairment may have on rates in the area as it continues to evaluate options to restore service. CenturyLink previously supplied impacted customers with satellite phones for their use free-of-charge and has transitioned to providing these customers a subsidy to obtain service from

¹ Prior to the establishment of a docket number for this matter, CenturyLink’s Application and filings to extend authority were submitted via the “Submit a Non-Docketed Filing” module of the Commission’s Electronic Comment Filing System pursuant to Sections 63.63(a), (b), 47 C.F.R. §§ 63.63(a), (b).

HughesNet or ViaSat.² CenturyLink is working with affected customers to help ensure a seamless transition to this new temporary service option and has secured the availability of that service alternative on a long-term basis. To date, consistent with what was reported in July 2019, approximately 10 customers have availed themselves of this option.

In its Application and in the extensions previously filed, CenturyLink described how the timing of service restoration would likely depend on the reconstruction of critical infrastructure in the area, namely County Road 386. As CenturyLink stated in those filings, the area continues to experience landslides and, as previously stated in prior filings, is still expected to be unstable for a prolonged period of time.³ These conditions put this preferred option for restoral on a lengthy timeline, at best, if it is viable at all. Unfortunately, temporary cable is not a feasible solution to provide service due to the rugged, mountainous terrain and instability in the area.

Because of the challenges associated with this preferred option, other options are being pursued. CenturyLink continues its work with affected residents, the Custer County Commissioners, Senator Cory Gardner's office, the Colorado Department of Transportation, and the United States Forest Service to explore alternatives. CenturyLink has scheduled a stakeholder meeting on September 18, 2019 with Custer County regarding potential solutions to provide service to affected customers; however, additional time is needed to finalize and implement a plan to restore service. CenturyLink expects to continue to hold stakeholder meetings on a periodic basis to keep all stakeholders informed and engaged in the efforts to restore service.

Options under consideration include state and federal broadband funding mechanisms to help defray the cost of rebuilding while also potentially enabling provision of broadband to this area and other neighboring underserved areas. At this time, CenturyLink is considering pursuing a state broadband funding opportunity that opens in January 2020. Additionally, CenturyLink continues to explore other funding opportunities through the United States Department of Agriculture, but those options still appear to have a lengthy timeline. In the meantime, CenturyLink will continue to coordinate with affected stakeholders and will report additional information regarding service restoral within approximately the next 60 days as part of the emergency impairment filing process under Section 63.63.

² It is CenturyLink's intent not to charge affected customers for services during the outage period.

³ See Exhibit A to November 19, 2018 filing which is a summary of challenges related to rebuilding in the area prepared by the United States Forest Service.

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For the foregoing reasons, in light of the devastating flooding and continued construction challenges in the area, CenturyLink respectfully requests that the Commission approve a further 60-day extension of authority for the emergency impairment of service in limited portions of the Florence wire center.

Respectfully submitted,

**QWEST CORPORATION D/B/A
CENTURYLINK QC**

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